EDWARD P. GEORGE, JR. (Bar No. 30120) TIMOTHY L. O'REILLY (Bar No. 150392) EDWARD P. GEORGE, JR., INC. 5000 East Spring Street, Suite 430 Long Beach, California 90815-1275 Telephone: (562) 497-2900

Attorneys for Respondent, Former Judge William H. Sullivan FILED

NOV 15 2001

Commission on Judicial Performance

STATE OF CALIFORNIA

BEFORE THE COMMISSION ON JUDICIAL PERFORMANCE

INQUIRY CONCERNING FORMER JUDGE WILLIAM H. SULLIVAN,

NO. 163.

ANSWER OF FORMER

JUDGE WILLIAM H. SULLIVAN

COMES NOW, Respondent, Former Judge William H. Sullivan, and answering the Notice of Formal Proceedings in the above-entitled inquiry, alleges as follows:

COUNT ONE

Respondent respectfully invokes his privilege against self-incrimination under the Fifth Amendment to the United States Constitution, and Article I, § 15, of the California Constitution, as to each and every allegation contained in Count One of the Notice.

COUNT TWO

Respondent respectfully invokes his privilege against self-incrimination under the Fifth Amendment to the United States Constitution, and Article I, § 15, of the California Constitution, as to each and every allegation contained in Count Two of the Notice.

COUNT THREE

Respondent respectfully invokes his privilege against self-incrimination under the Fifth Amendment to the United States Constitution, and Article I, § 15, of the California Constitution, as to each and every allegation contained in Count Three of the Notice.

COUNT FOUR

Respondent respectfully invokes his privilege against self-incrimination under the Fifth Amendment to the United States Constitution, and Article I, § 15, of the California Constitution, as to each and every allegation contained in Count Four of the Notice.

Respectfully submitted,

EDWARD P. GEORGE, JR. TIMOTHY L. O'REILLY

EDWARD P. GEORGE, JR., INC.

EDWARD P. GEO

Attorneys for Respondent

Former Judge William H. Sullivan

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I, WILLIAM H. SULLIVAN, declare that:

I am the respondent former judge in the above-entitled proceeding. I have read the foregoing Answer of Former Judge William H. Sullivan, and hereby invoke my privilege against self-incrimination under the Fifth Amendment to the United States Constitution, and Article I, § 15, of the California Constitution, as to each and every allegation contained in Counts One, Two, Three and Four of the Notice.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 14, 2001, at Riverside, California.

WILLIAM H. SULLIVAN

Judge No. 163

PROOF OF SERVICE

State of California, County of Los Angeles:

I, Kay L. Marcum, declare that: I am and was at all times herein mentioned, a citizen of the United States; employed in the county aforesaid; over the age of 18 years; and not a party to the within action or proceeding. My business address is 5000 East Spring Street, Suite 430, Long Beach, California 90815.

The original **Answer of Former Judge William H. Sullivan to Notice of Formal Proceedings** was served for filing with the Commission on Judicial Performance on November 14, 2001, by placing the original Answer in a sealed Federal Express envelope addressed to the Commission on Judicial Performance, 455 Golden Gate Avenue, Suite 14400, San Francisco, California 94102; said envelope was deposited with the Federal Express office in Long Beach, California, on said date for delivery to the Commission on November 15, 2001.

The Answer of Former Judge William H. Sullivan to Notice of Formal Proceedings was served on Jack Coyle, Trial Counsel, Commission on Judicial Performance, by placing a true copy thereof, in a sealed envelope with postage thereon fully prepaid, and causing said envelope to be deposited in the United States mail at Long Beach, California, on November 14, 2001, addressed as follows:

Jack Coyle, Trial Counsel Commission on Judicial Performance 455 Golden Gate Avenue, Suite 14400 San Francisco, CA 94102

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on November 14, 2001, at Long Beach, California.